

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 21-cr-91-wmc

MOHAMMAD HAROON IMAAD,

Defendant.

MOTION FOR THE COURT TO SCHEDULE A BOND HEARING

Mohammad Imaad, by counsel files this motion for the Court to set a bond hearing. Conscious that the hearing time depends on interpreter availability, the defense is not proposing a time. I have spoken to AUSA Laura Przybylinski-Finn and she does not oppose having a bond hearing.

Mr. Immad has signed a plea agreement to a disorderly conduct charge under the assimilated crimes act and is awaiting a plea and sentencing; the charge provides a maximum available sentence of three months, which is rapidly approaching. Besides the natural fear that he would over-serve his sentence, the defense is also hoping to expedite his release from *all* custody. The defense's previous inability to argue for bond was tied to Mr. Immad's immigration status and not having any place for him to go. The defense has now secured a place for Mr. Immad to live in Madison. After consulting with immigration attorneys about

this, the defense believes that if Mr. Immad is released on bond by this Court, he will go to immigration custody, where he will be released to the proposed residence. Thus, to get this process started and ensure he does not spend any more time in custody than necessary, the defense respectfully requests that the Court schedule a bond hearing, where the defense can argue for release and answer any of the Court's questions.

Dated at Madison, Wisconsin, this 5th day of November, 2021.

Respectfully submitted,

Mohammad Haroon Imaad, Defendant

/s/Joseph A. Bugni
Joseph A. Bugni

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